

**From:** Dave Bolland [mailto:DaveB@acwa.com]  
**Sent:** Wednesday, April 06, 2011 4:32 PM  
**To:** Davidoff, Baryohay  
**Cc:** Dave Ceppos; Avila, Andria K.; Alemi, Manucher  
**Subject:** "Vote" on Draft Water Measurement Regulation by ASC Member David Bolland, ACWA

Baryohay - As instructed in last week's e-mails, here is my "vote" on the Draft Agricultural Water Measurement Regulation, dated March 18, 2011.

Submitted by David Bolland, Member of the Agricultural Stakeholder Committee representing the Association of California Water Agencies

Vote: "Qualified Disagreement"

Comments: I remain concerned about the practical capability of some agricultural water agencies under actual field conditions to demonstrate immediate compliance with the proposed accuracy standards in March 18 version of the regulation. This issue has been raised and discussed by many members of the Agricultural Stakeholder Committee and its A-2 Subcommittee during many meetings, yet the issue was not resolved by convincing evidence.

With regard to the March 18 draft regulation, measurement accuracy standards seem to be too high and difficult to interpret, and the certification and performance requirements seem to be unnecessarily burdensome at some points. I believe these deficiencies can be addressed by incorporating additional changes to the text, as proposed by a broad group of agricultural water suppliers and submitted as an alternative to the March 18 version of the regulation.

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